



Janet Napolitano
Governor

Victor M. Mendez
Director

Arizona Department of Transportation

Office of the Director

206 South Seventeenth Avenue Phoenix, Arizona 85007-3213

Debra Brisk
Deputy Director

December 3, 2004

Ms. Cecilia Martinez
Deputy Superintendent of Trust Services
Bureau of Indian Affairs
Pima Agency
P.O. Box 8
Sacaton, Arizona 85247

RE: South Mountain Freeway Environmental Impact Statement & Location/Design
Concept Study
ADOT Tracs No. H 5764 01L

Dear Ms. Martinez:

As you are aware, part of the on-going public involvement efforts by the Arizona Department of Transportation and HDR, Inc. (engineering consultant to ADOT), on the South Mountain Freeway project, is an on-going dialogue with Community members. Throughout the life of the project, we have periodically met with Community members through District update meetings and occasional landowner meetings. As we move forward on the project we would like to reach out to more of the landowners within this area of the Community.

This letter is to request your assistance, as the repository of landowner records, in providing the name and addresses of the parcel owners within the freeway study's affected area. This information will be used to notify landowners of upcoming meetings and to invite their input into the study process. Enclosed, we are providing the realty group of the Pima Agency with a map developed by HDR that delineates parcels within the Community that we believe may be affected by this study.

If you would like, we will use our resources to send the landowner notices. We are very aware of the sensitivity of this information and the high level of confidentiality that must be maintained upon receipt of this documentation. Therefore, any records we receive will *only* be used to generate a mailing list for its intended purpose of notifying landowners of upcoming meetings and inviting their input into the study process.



If you honor this request, you may send the information in the form you deem most convenient (i.e., hard copy, electronic - spreadsheet, GIS, etc.), to the following address:

Shannon L. Wilhelmsen
206 S. 17th Avenue
Mail Drop 118A
Phoenix, AZ 85007
SWilhelmsen@dot.state.az.us

I look forward to continuing to work with you and your staff as this project moves forward. If you have any questions regarding this matter, or the study in general, please do not hesitate to contact me at (602) 712-7356.

Sincerely,

Shannon L. Wilhelmsen, Director
Communication and Community Partnerships

CC: Governor Narcia, GRIC
Lt. Governor Thomas, GRIC
Sandra Shade, GRIC DOT
Bill Vachon, FHWA
Mike Bruder, ADOT
Amy Edwards, HDR
Project File



Janet Napolitano
Governor

Victor M. Mendez
Director

Arizona Department of Transportation

Intermodal Transportation Division

206 South Seventeenth Avenue Phoenix, Arizona 85007-3213

March 21, 2005

Michael J. Ortega
State Engineer

Mr. Pete Overton
Environmental Preservation Specialist
The Bureau of Indian Affairs
Pima Agency
P.O. Box 8; Sacaton, AZ 85247

Re: Project Name: South Mountain Freeway
ADOT TRACS No: 202 MA 054 H5764 01L
Project No: RAM-202-C-(200)

Dear Mr. Overton:

The Bureau of Indian Affairs (BIA) is a cooperating agency with Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) for the South Mountain Freeway Environmental Impact Statement (EIS). Per our phone conversation on February 2, 2005, I am, submitting on behalf of FHWA this letter requesting that BIA formally comment on the EIS document format, requirements, review process and timeframes. These comments, as they relate to BIA's needs, will allow ADOT to ensure that they are reflected in the FHWA document. If BIA requires additional sections be included in the EIS, please inform me and I will forward to FHWA for their review.

After your review, I would like to set up a meeting, if you consider it appropriate, between FHWA, ADOT and yourself, so we discuss in detail your review comments. Please let me know of the date, location and time that are appropriate for you.

EIS review process

After ADOT Environmental & Enhancement Group (EEG) reviews and incorporates comments of the Working Draft EIS, it will be submitted to FHWA for initial review (the document will include line numbers). It is also anticipated that FHWA, and BIA will review the Draft and Final documents concurrently and that a quick turn around review time for each submittal will be required. Please let me know how many bound and/or unbound copies of each document you will need for your review.



Mr. Overton
Page 2

After this review, a comment resolution meeting will be held to discuss and resolve comments on the document. Once the Draft EIS is completed and approved by FHWA, the document will be available for public review. The anticipated public hearings (still to be established) will be announced with the publication of the Draft EIS.

After the public hearings, an additional cooperating agency comment resolution meeting will be held to discuss the comments received from the public involvement process. After ADOT EEG reviews the pre-final EIS, the final document will be reviewed by FHWA and the cooperating agencies. To finalize the EIS process, FHWA will request BIA provide them a letter stating their agreement with the findings of the EIS.

If you have any questions or need additional information, please contact me as noted below.

Respectively,

Maria A. Deeb-Roberge, PE, MEP
205 S. 17th Ave. Room 213E, MD 619E
Phoenix, Arizona 85007

ADOT NEPA Planner & Valley Team Leader
Environmental & Enhancement Group, Planning Section
602.712.8641 (Direct phone number)
602.712.3352 (Direct fax number)
602.712.3600 (Main Office fax number)

- Enclosures

c.c. Steve Thomas, FHWA
Mike Bruder, ADOT Valley Project Management
Ralph Ellis, ADOT Environmental & Enhancement Group
Amy Edwards, HDR, Inc
Jack Allen, HDR, Inc
Project file



Mr. Overton
Page 3

Dear Mr. Overton:

Please complete as appropriate,

1. Does BIA require **additional sections** be included in the EIS? (yes or no)

If yes, please inform me and I will forward to FHWA for they review.

2. After your review, do you consider appropriate, to **set up a meeting** between FHWA, ADOT and yourself, so we discuss in detail your review comments? (yes or no)

If yes, please let me know of the date, location and time that are appropriate for you.

3. BIA will review the Draft and Final documents and a quick turn around review time for each submittal will be required.

Please let me know **how many** bound and/or unbound copies of each document you will need for your review.

Upon completion please forward to:

Maria A. Deeb-Roberge, PE, MEP
205 S. 17th Ave. Room 213E, MD 619E
Phoenix, Arizona 85007

ADOT NEPA Planner & Valley Team Leader
Environmental & Enhancement Group, Planning Section
602.712.8641 (Direct phone number)
602.712.3352 (Direct fax number)
602.712.3600 (Main Office fax number)



RE: **South Mountain Freeway EIS & L/DCR Table of Contents.**

Summary

Introduction
Purpose of the Environmental Impact Statement
Description of the Approach Used to Prepare the Draft EIS
Coordination Undertaken to Date
Status of the Project Description & the Preferred Alternative at the Draft EIS Stage
Purpose of and Need of the Proposed Action
Other Government Actions and Permits Required
 Section 404 Permit, Clean Water Act
 Section 401, Water Quality Certification, Clean Water Act
 Section 402, NPDES Permit, Clean Water Act
 Application for Earth Moving Permit, Demolition, and Dust Control Plan
 Floodplain?
 Incidental Take Permit, Section 7, Endangered Species Act ?
 Section 106 National Historic Preservation Act Memorandum of Agreement
 Change of Access Report
 Various Utility Relocations
 Farmlands Form AD-1006?
 Government-to-Government Agreements
 Tribal Council Resolution
 Other Governmental Agreements
 Others???

Summary of Environmental Consequences
Areas of Concern (Unresolved Issues) and expected date of resolution, if known
Mitigation Measures to Avoid, Reduce, or Otherwise Mitigate Adverse Effects
How Draft EIS Comments Will Be Reviewed and Responded To
Independent Evaluation of the Draft EIS
Purpose of the Draft EIS

Chapter 1 Purpose and Need

Introduction
Project Location, Description, and Status
ADOT Mission Statement
Regional Transportation Planning
 Freeways
 Transit
 Streets
 Transportation Demand Management and Transportation Systems Management
Need for the Proposed Action
 Social Demands and Economic Development
 Historical Population Growth, Projections, and Housing Projections
 Economic Development



Conclusion

- Transportation Demand and Capacity
 - Methodology
 - Existing Conditions
 - 2025 Conditions without South Mountain Freeway
 - 2025 Conditions with South Mountain Freeway
- Purposes for the Proposed Action
 - System Linkage
 - Legislation-Regional and Local Planning
 - Regional Planning Context
 - Local Planning Context
 - Proposed Action Within the Context of Interstate Travel
- Chapter 2** Gila River Indian Community Coordination
 - Introduction
 - District Coordination
 - Council Coordination
 - Governmental Department Coordination
 - Citizens' Advisory Team Coordination
 - GRIC Public Involvement
 - Status of GRIC Alignments at Time of DEIS Issuance
 - Treatment of Impacts on GRIC Land
 - Treatment of Section 4(f) Resources
 - Future Coordination
 - Context of Coordination in Relation to Environmental Justice Executive Order
- Chapter 3** Alternatives
 - Project Termini and Why They Are Logical
 - Alternatives Considered
 - Status of Alternatives
 - Concurrence to Historical Context
 - Western Section Alternatives
 - Eastern Section Alternatives
 - Treatment of Section 4(f) at the Draft EIS Stage (South Mountain Park)
 - Alternatives Screening Process
 - Screening Process Described
 - Creation and Screening of Corridors
 - Creation and Screening of Alignments
 - Screening Western Section Alignments
 - Screening Eastern Section Alignments
 - Beneficial Effects of Screening Process
 - Alternatives Considered But Eliminated From Further Study
 - Non-Freeway Alternatives
 - TSM and TDM Alternatives
 - Transit Alternatives
 - Arterial Road Network Expansion Alternatives
 - Land Use Alternatives
 - Freeway/Light Rail Combination Alternatives
 - Freeway Alignment Alternatives



Western Section

- Eastern Section
 - Chandler Boulevard Alignment
 - Baseline Road (US60 Extension) Alignment
- South Mountain Park Section
 - Tunnel Alternative
 - Bridge Alternative?
- Alternatives Studied in Detail
 - No-Action Alternative
 - Action Alternatives
 - Renaming of Alternatives for the Draft EIS
 - Creation of Western and Eastern Sections for the Draft EIS
- Horizontal and Vertical Alignments Described for Action Alternatives
 - Western Section
 - 59th Avenue Alternative
 - 71st Avenue Alternative
 - 99th Avenue Alternative and Options
 - Eastern Section
 - Pecos Road Alternative
- Traffic Interchange Configuration Assumptions
 - System-to-System Interchanges (I-10 Connections)
 - Service Interchanges
- Right-of-Way Requirements Described for Action Alternatives
- Major Design Features Common to Action Alternatives
 - Design Criteria
 - Typical Mainline Freeway Sections
 - Auxiliary Lanes
 - TSM/TDM Strategies
 - Traffic Control Devices and Illumination
 - Utilities
 - Principal Items (Earthwork)
 - Drainage
 - Pavement Treatment
 - Planning-Level Construction Costs
 - Construction Sequencing, Schedule, & Traffic Control
 - Enhancement Opportunities
- Traffic Analysis
 - Operational Characteristics
 - Mainline Characteristics
 - I-10 Operations
 - Western Section
 - Eastern Section
 - Anticipated Traffic Mix Once in Operation
- Identification of Preferred Alternative
- Compliance with Section 404(b)(1) Guidelines



Chapter 4 Affected Environment, Consequences, and Mitigation

- Introduction
- Statement of Negative Declaration (if applicable)
- Land Use
 - Affected Environment
 - Existing Land Use
 - Western Section
 - Eastern Section
 - Plans and Policies for Future Land Use Development
 - General Plans
 - Maricopa County
 - City of Phoenix
 - Avondale
 - Tolleson
 - Glendale
 - Chandler
 - Zoning Ordinances
 - Other Plans
- Environmental Consequences
 - Impacts Associated with All Action Alternatives, Western and Eastern Sections (Land Use Conversion)
 - Western Section Alternatives
 - Impacts Associated with Western Section Alternatives
 - 59th Avenue Alignment
 - Land Use Compatibility
 - Land Use Plan Consistency
 - 71st Avenue Alignment
 - Land Use Compatibility
 - Land Use Plan Consistency
 - 99th Avenue Alignment (Including Options)
 - Land Use Compatibility
 - Land Use Plan Consistency
 - Eastern Section Alternative (Pecos Road Alternative)
 - Land Use Compatibility
 - Land Use Plan Consistency
 - No-Action Alternative
 - Land Use Compatibility
 - Land Use Plan Consistency
 - Beneficial Effects Associated with All Action Alternatives
- Mitigation
 - Avoidance Measures
 - Minimization Measures
- Social Conditions
 - Affected Environment
 - Demographic Characteristics
 - Regional Characteristics
 - Western Section
 - Eastern Section



- Community Facilities and Services
 - Western Section
 - Schools
 - Parks and Recreational Areas
 - Bicycle and Pedestrian Facilities
 - Equestrian Facilities
 - Medical Facilities
 - Police and Fire Facilities
 - Utilities
 - Eastern Section
 - Schools
 - Parks and Recreational Areas
 - Bicycle and Pedestrian Facilities
 - Equestrian Facilities
 - Medical Facilities
 - Police and Fire Facilities
 - Utilities
- Projected Growth
 - Western Section
 - Eastern Section
- Environmental Consequences
 - Community Character and Cohesion
 - Social Impacts Associated with All Action Alternatives (W/E)
 - Travel Patterns and Accessibility
 - Public Facilities
 - Regional and Community Growth
 - Social Impacts Associated with Western Section Alternatives
 - 57th Avenue Alternative
 - 71st Avenue Alternative
 - 99th Avenue Alternative (and Options)
 - Social Impacts Associated with Eastern Section Alternative
 - No-Action Alternative
 - Beneficial Effects Associated with All Action Alternatives
 - Mitigation
 - Avoidance Measures
 - Minimization Measures
- Title VI and Environmental Justice
 - Western Section Alternatives
 - 57th Avenue Alternative
 - 71st Avenue Alternative
 - 99th Avenue Alternative (and Options)
 - Eastern Section Alternative
 - No-Action Alternative
 - Beneficial Effects Associated with All Action Alternatives
- Mitigation
 - Avoidance Measures
 - Minimization Measures
- Displacements and Relocations



Impacts Associated with All Action Alternative (W/E)
Impacts Associated with Western Section Alternatives
57th Avenue Alternative
71st Avenue Alternative
99th Avenue Alternative (and Options)
Impacts Associated with Eastern Section Alternative
No-Action Alternative
Beneficial Effects Associated with All Action Alternatives
Mitigation
Avoidance Measures
Minimization Measures

Economics
Affected Environment
Primary Industrial Sectors
Sales Tax Generation
Property Tax
Other Revenues
Overall Regional Economic Assessment
Environmental Consequences (State, County, Local)
Impacts Associated with All Western Section Alternatives
Conversion of Private Lands to Transportation Use
Primary Industrial Sectors
Sales Tax Generation
Property Tax
Other Revenues
Impacts Associated with 57th Avenue Alternative
Conversion of Private Lands to Transportation Use
Primary Industrial Sectors
Sales Tax Generation
Property Tax
Other Revenues
Impacts Associated with 71st Avenue Alternative
Conversion of Private Lands to Transportation Use
Primary Industrial Sectors
Sales Tax Generation
Property Tax
Other Revenues
Impacts Associated with 99th Avenue Alternative (and Options)
Conversion of Private Lands to Transportation Use
Primary Industrial Sectors
Sales Tax Generation
Property Tax
Other Revenues
Impacts Associated with All Eastern Section Alternative
Conversion of Private Lands to Transportation Use
Primary Industrial Sectors
Sales Tax Generation
Property Tax



Other Revenues
Local Jurisdiction Assessments of Economic Impacts
No-Action Alternative
Beneficial Effects Associated with All Action Alternatives
Regional Economy
Ridership Benefits
Mitigation
Avoidance Measures
Minimization Measures

Air Quality
Affected Environment
Relevant Pollutants
Air Quality Regulations and Planning
Clean Air Act Amendments of 1990
Federal Attainment Status and Implementation Plans
National and State Ambient Air Quality Standards
Regional Overview
Project Level Analysis
Air Quality Regulation Trends (to address recent trends)
Environmental Consequences
Impacts Associated with All Action Alternatives (W/E)
Impacts Associated with Western Section Alternatives
Impacts Associated with Eastern Section Alternative
No-Action Alternative
Beneficial Effects Associated with All Action Alternatives
Mitigation
Avoidance Measures
Minimization Measures

Noise
Affected Environment
Noise Criteria
Existing Noise Levels
Unique Characteristics (Truck Stack, Night Readings, Bowl Effect)
Environmental Consequences
Impacts Associated with the Operation of All Action Alternatives
Impacts Associated with Western Section Alternatives
57th Avenue Alternative
71st Avenue Alternative
99th Avenue Alternative (and Options)
Impacts Associated with Eastern Section Alternative
No-Action Alternative
Beneficial Effects Associated with All Action Alternatives
Mitigation
Avoidance Measures
Minimization Measures

Water Resources
Affected Environment
Surface Water



- Watershed Description and Flow Characteristics
 - Surface Water Quality
 - Water Supply Trends (?)
- Groundwater
 - Groundwater Setting and Development
 - Groundwater Quality
- Environmental Consequences
 - Operational Impacts Associated with All Action Alternatives
 - Operational Impacts Associated with Western Section Alternatives
 - 57th Avenue Alternative
 - 71st Avenue Alternative
 - 99th Avenue Alternative (and Options)
 - Operational Impacts Associated with Eastern Section Alternative
 - No-Action Alternative
 - Beneficial Effects Associated with the Action Alternatives
 - Mitigation
 - Avoidance Measures
 - Minimization Measures
- Floodplains
 - Affected Environment
 - Existing Conditions
 - Water Course Description
 - Summary of Flooding History
 - Factors Affecting Flooding Risks
 - Environmental Consequences
 - Operational Impacts Associated with All Action Alternatives
 - Risks Associated with the Action
 - Impacts on Natural and Beneficial Floodplain Values
 - Support of Incompatible Floodplain Development
 - Measures to Minimize Floodplain Impacts
 - Measures to Restore Natural and Beneficial Floodplain Values
 - Alternatives to Encroachments
 - Potential for Significant Encroachment
 - No-Action Alternative
 - Beneficial Effects Associated with the Action Alternatives
 - Mitigation
 - Avoidance Measures
 - Minimization Measures
- Jurisdictional Waters of the United States
 - Affected Environment
 - Environmental Consequences
 - Impacts Associated with All Action Alternatives
 - No-Action Alternative
 - Beneficial Effects Associated with the Action Alternatives
 - Mitigation
 - Avoidance Measures
 - Minimization Measures
- Topography, Geology and Soils



- Affected Environment
 - Soils and Topography
 - Geology
 - Land Subsidence
 - Earth Fissures
 - Seismic Activity
 - Mining
- Environmental Consequences
 - Impacts Associated with All Action Alternatives
 - No-Action Alternative
 - Beneficial Effects Associated with All Action Alternatives
- Mitigation
 - Avoidance Measures
 - Minimization Measures
- Biological Resources
 - Affected Environment
 - Biological Resources Regulations
 - Federal
 - State
 - Description of Ecosystem
 - Threatened and Endangered Species/Arizona Species of Concern
 - Arizona Native Plant Law Species
 - Invasive Species
 - Environmental Consequences
 - Impacts Associated with All Action Alternatives
 - Impacts Associated with Western Section Alternatives
 - 57th Avenue Alternative
 - 71st Avenue Alternative
 - 99th Avenue Alternative (and Options)
 - Impacts Associated with Eastern Section Alternative
 - No-Action Alternative
 - Beneficial Effects Associated with the Action Alternatives
 - Mitigation
 - Avoidance Measures
 - Minimization Measures
- Cultural Resources
 - Affected Environment
 - Cultural Resource Regulations
 - Conditions
 - Environmental Consequences
 - Archaeological Resource Impacts – Western Section
 - Archaeological Resource Impacts – Eastern Section
 - Historic Resource Impacts – Western Section
 - Historic Resource Impacts – Eastern Section
 - Impacts on Traditional Cultural Properties
 - No-Action Alternative
 - Beneficial Effects Associated with the Action Alternatives
 - Mitigation



	Avoidance Measures
	Minimization Measures
Hazardous Materials	
Affected Environment	
Environmental Consequences	
Impacts Associated with All Action Alternatives	
Impacts Associated with Western Section Alternatives	
57 th Avenue Alternative	
71 st Avenue Alternative	
99 th Avenue Alternative (and Options)	
Impacts Associated with Eastern Section Alternative	
No-Action Alternative	
Beneficial Effects Associated with the Action Alternatives	
Mitigation	
Avoidance Measures	
Minimization Measures	
Visual Resources	
Affected Environment	
Pertinent Regulations and Guidance	
Local Setting	
Visual Character and Quality	
Environmental Consequences	
Impacts Associated with Operation of All Action Alternatives	
Western Section Alternatives	
57 th Avenue Alternative	
71 st Avenue Alternative	
99 th Avenue Alternative (and Options)	
Eastern Section Alternative	
No-Action Alternative	
Beneficial Effects Associated with the Action Alternatives	
Mitigation	
Avoidance Alternatives	
Minimization Alternatives	
Farmlands	
Affected Environment	
Existing Prime and Unique Farmlands	
Planned Designations	
Environmental Consequences	
Impacts Associated with All Action Alternatives	
Western Section Alternatives	
57 th Avenue Alternative	
71 st Avenue Alternative	
99 th Avenue Alternative (and Options)	
Eastern Section Alternative	
No-Action Alternative	
Beneficial Effects Associated with the Action Alternatives	
Mitigation	
Avoidance Alternatives	



	Minimization Alternatives
Energy	
Affected Environment	
Environmental Consequences	
Impacts Associated with All Action Alternatives	
No-Action Alternative	
Beneficial Effects Associated with the Action Alternatives	
Mitigation	
Avoidance Alternatives	
Minimization Alternatives	
Temporary Construction Impacts	
Construction Impacts Associated with All Action Alternatives	
Air Quality	
Noise	
Water Resources	
Socioeconomic Conditions	
Pedestrian and Vehicular Traffic	
Utilities	
Visual Resources	
No-Action Alternative	
Beneficial Effects Associated with the Action Alternatives	
Mitigation	
Avoidance Alternatives	
Minimization Alternatives	
Irreversible and Irretrievable Commitments of Resources	
Relationship Between Short-Term Uses of the Environment and Long-Term Productivity	
Secondary and Cumulative Impacts	
Introduction	
Purpose and Regulatory Basis	
FHWA and CEQ Guidance	
Secondary Impacts	
Cumulative Impacts	
Methodology	
Overview of Historic, Existing, and Future Conditions	
Demographics	
Population Growth	
Income and Minority Status	
Land Use and Ownership	
Analysis of Potential Impacts	
Statement of Negative Declarations	
Elements Analyzed	
Topography	
Analysis of Potential Impacts	
Mitigation and Responsibility	
Vegetation/Native Plants	
Analysis of Potential Impacts	
Mitigation and Responsibility	
Water Resources	



- Analysis of Potential Impacts
- Mitigation and Responsibility
- Noise Levels
 - Analysis of Potential Impacts
 - Mitigation and Responsibility
- Visual Resources
 - Analysis of Potential Impacts
 - Mitigation and Responsibility
- Land Ownership, Right-of-Way Acquisition
 - Analysis of Potential Impacts
 - Mitigation and Responsibility
- Potential Relocations and Other Conversions
 - Analysis of Potential Impacts
 - Mitigation and Responsibility
- Traffic Conditions and Access Routes
 - Analysis of Potential Impacts
 - Mitigation and Responsibility
- Community Character and Cohesion
 - Analysis of Potential Impacts
 - Mitigation and Responsibility
- Public Service Facilities
 - Analysis of Potential Impacts
 - Mitigation and Responsibility
- Population Trends
 - Analysis of Potential Impacts
 - Mitigation and Responsibility
- Economic Conditions
 - Analysis of Potential Impacts
 - Mitigation and Responsibility

Chapter 5 Section 4(f) Evaluation

- Introduction
 - Definition of Section 4(f)
 - Status of GRIC Alternatives within Section 4(f) Context
- Description of Section 4(f) Resources in the Western Section, Impacts, & Measures to Minimize Harm
 - Property No. 1
 - Description
 - Direct Impacts
 - Proximity Impacts
 - Measures to Minimize Harm
 - Property No. 2
 - Description
 - Direct Impacts
 - Proximity Impacts
 - Measures to Minimize Harm
 - Property No. 3
 - Description
 - Direct Impacts



- Proximity Impacts
 - Measures to Minimize Harm
- Property No. 4
 - Description
 - Direct Impacts
 - Proximity Impacts
 - Measures to Minimize Harm
- Description of Section 4(f) Resources in the Eastern Section, Impacts, & Measures to Minimize Harm
 - Property No. 1
 - Description
 - Direct Impacts
 - Proximity Impacts
 - Measures to Minimize Harm
 - Property No. 2
 - Description
 - Direct Impacts
 - Proximity Impacts
 - Measures to Minimize Harm
 - Property No. 3
 - Description
 - Direct Impacts
 - Proximity Impacts
 - Measures to Minimize Harm
 - Property No. 4
 - Description
 - Direct Impacts
 - Proximity Impacts
 - Measures to Minimize Harm (and so on)
- Avoidance Alternatives in Both Western and Eastern Section
 - Avoidance Alternative No. 1
 - Avoidance Alternative No. 2
 - Avoidance Alternative No. 3
 - Avoidance Alternative No. 4 (and so on)
- Coordination
- Chapter 6** Comments and Coordination
 - Previous Coordination Activities
 - Environmental Impact Statement Coordination
 - Agency Coordination
 - Cooperating Agencies
 - Participating Agencies
 - Stakeholders
 - Public Coordination
 - Western Section Communities
 - Eastern Section Communities
 - Citizens' Advisory Team
 - Environmental Justice Populations
 - Gila River Indian Community



Future Coordination and Project Actions
DEIS Distribution

List of Preparers and Contributors
Abbreviations and Glossary
Index
Bibliography, References, and Communications



Janet Napolitano
Governor
Victor M. Mendez
Director

Arizona Department of Transportation
Intermodal Transportation Division
206 South Seventeenth Avenue Phoenix, Arizona 85007-3213

April 14, 2005

Daniel Lance
Deputy State
Engineer

Sandra Shade, Director
GRIC Department of Transportation
315 West Casa Blanca Road, PO Box 97
Sacaton, AZ 85247

Re: Project Name: South Mountain Freeway
ADOT TRACS No: 202 MA 054 H5764 01L
Project No: NH-202-D-()

Dear Ms. Shade:

The Gila River Indian Community (GRIC) is an important stakeholder that, together with Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are collaborating in the development of the South Mountain Freeway Environmental Impact Statement (EIS). Per the phone conversation with your office on April 14, 2005, I am, submitting on behalf of FHWA this letter requesting that GRIC comment on the EIS table of contents. These comments, as they relate to GRIC's needs, will allow ADOT to ensure that they are reflected in the FHWA document.

After your review of the table of contents for the EIS, I would like to set up a meeting, if you consider it necessary and appropriate, between FHWA, ADOT and yourself, so we can discuss in detail your review comments. Please let me know of the date, location and time that is appropriate for you.

EIS review process

After ADOT Environmental & Enhancement Group (EEG) reviews and incorporates comments of the Administrative Draft EIS, it will be submitted to FHWA for initial review (the document will include line numbers). At this time we would like to know if the GRIC will participate in a concurrent review with FHWA, the Army Corps of Engineers and the Bureau of Indian Affairs (BIA) of the Draft and Final documents, and that a 4 weeks turn around review time for each submittal will be required. Please let me know how many copies of each document you will need for your review, as well as the time you consider appropriate for the reviews mentioned above.



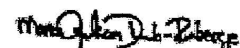
Ms Shade
Page 2

After this review, a comment resolution meeting will be held to discuss and resolve comments on the document. Once the Draft EIS is completed and approved by FHWA, the document will be available for public review. The anticipated public hearings (still to be established) will be announced with the publication of the Draft EIS.

After the public hearings, an additional cooperating agency comment resolution meeting will be held to discuss the comments received from the public involvement process. After ADOT EEG reviews the pre-final EIS, the final document will be reviewed by FHWA, GRIC and the cooperating agencies. To finalize the EIS process, FHWA will request the cooperative agencies provide them a letter stating their agreement with the findings of the EIS and will continue to work with the GRIC in final resolution.

If you have any questions or need additional information, please contact me as noted below.

Respectfully,



Maria A. Deeb-Roberge, PE, MEP
205 S. 17th Ave. Room 213E, MD 619E
Phoenix, Arizona 85007

ADOT NEPA Planner & Valley Team Leader
Environmental & Enhancement Group, Planning Section
602.712.8641 (Direct phone number)
602.712.3352 (Direct fax number)
602.712.3600 (Main Office fax number)

- Enclosures

c.c. Steve Thomas, FHWA
William Vachon, FHWA
Mike Bruder, ADOT Valley Project Management
Ralph Ellis, ADOT Environmental & Enhancement Group
Matt Burdick, ADOT Communication & Community Partnerships
Amy Edwards, HDR, Inc
Jack Allen, HDR, Inc
Project file



Janet Napolitano
Governor

Victor M. Mendez
Director

Arizona Department of Transportation

Communication and Community Partnerships

206 South Seventeenth Avenue • Phoenix, Arizona 85007-3213

Shannon Wilhelmser
Communications
Director

April 15, 2005

Ms. LaQuinta Allison, Community Chairperson
District 4 Community Council
Gila River Indian Community
District 4 Service Center
PO Box 557
Sacaton, AZ 85247

RE: ADOT South Mountain Freeway Environment Impact Statement and
Location/Design Concept Report

Dear Ms. Allison:

Thank you for the opportunity to visit your District on November 15, 2004, to share information about the South Mountain Freeway Study and to receive District members' input, opinions and/or concerns regarding the study efforts. Please see the following list of the input we received.

- Concern expressed to keep the land for the children who are the future of the Community.
- The land is needed for homes in the future.
- A freeway may be useful in the future but not now.
- Do not want the freeway on GRIC but do not want to be blocked from having access to it.
- Concerned about environmental impacts whether a freeway is on GRIC or not - noise impacts, potential for rubberized asphalt.
- Tired of ADOT's question and answer sessions regarding the freeway.
- How many acres of GRIC land would a freeway take? Allotted lands? Tribal lands?
- ADOT has made promises in the past with regard to SR 587, SR 87 and I-10 freeway access.
- GRIC has a resolution saying no to the freeway.
- Problems (traffic speeds, safety) with SR 587 and SR 87 at Santan Road and Sesame Road.

We recognize and respect the importance of the Gila River Indian Community ("GRIC") land to the landowners and members of the Tribal Community and we will not study alternatives on the Gila River Indian Community without approval from the Community.

We respect the Community's resolution regarding any freeway construction on GRIC lands. We also recognize that potential alternatives on GRIC lands would involve both allotted lands and tribal lands. As such, we are working with both the Natural Resources Standing Committee and the BIA to involve as many tribal members in the decision as possible.



If the Community allows the Study Team to study GRIC alternatives, these alternatives would be located within the study area described by the Community, which does not include Riggs Road. Also, any study of GRIC alternatives would include a detailed study of a wide variety of environmental, societal and design issues, including concerns regarding traffic, air quality, etc. If the Community does not allow the Study Team to study GRIC alternatives, the Study Team will continue to work with the Community to provide information regarding any possible alignment alternatives that are not on the Community, and the impacts that these alignments adjacent to the Community may create. Additionally, the Study Team will also continue to study and analyze the No-Build alternative that could become the preferred option if detailed study of the environmental, societal and design issues of each build alternative evidences too much negative affect.

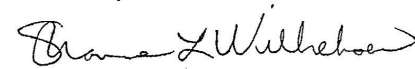
Given the lengthy history of this project, (almost 20 years), there have been other alternatives studied in the area, including a toll road. During the development of the toll road study, during the early 1990's, it became apparent that the project would not be economically feasible and was dropped from further study. At this time, the South Mountain Freeway Study is not considering a toll road option.

We also recognize that there are other concerns within the Community regarding highways and freeways not associated with the South Mountain Freeway. As such, we will be researching the concerns you expressed regarding SR 587, SR 87 and I-10. Where problems exist, ADOT will work with the Community on potential solutions.

During the last few months, we have also had the opportunity to visit Districts 6 and 7 with this same presentation. We have attached a summary of what was heard at those meetings as well for your information. All of this information will be provided to the Gila River Indian Community Department of Transportation, Natural Resources Standing Committee, and Executive Office, as well as the Bureau of Indian Affairs.

We at ADOT recognize the need for on-going discussion with the Community regarding this project and others. As such, we are offering to meet regularly with your District members to discuss issues pertaining to all ADOT facilities. We look forward to working with you. If you have any questions or comments regarding the information presented in this letter, please do not hesitate to contact Shannon at 602-712-7356 and Mike at 602-712-6836. Thank you again for the opportunity to meet with you and your District Council.

Sincerely,



Shannon L. Wilhelmsen, Director
Communication and Community Partnerships

CC: Ms. Sandra Shade, GRIC DOT
Mr. Gary Bohnee, GRIC Chief of Staff
GRIC Natural Resources Standing Committee
Mr. Ben Nuvamsa, BIA Superintendent
Ms. Cecilia Martinez, BIA Deputy Superintendent
Mr. Bill Vachon, FHWA
Mr. Dan Lance, ADOT
Ms. Amy Edwards, HDR

Sincerely,



Mike Bruder, Project Manager
ADOT Valley Project Management



Janet Napolitano
Governor

Victor M. Mendez
Director

Arizona Department of Transportation

Communication and Community Partnerships

206 South Seventeenth Avenue Phoenix, Arizona 85007-3213

Shannon Wilhelmsen
Communications
Director

April 15, 2005

Mr. Terrance Evans, Community Chairperson
District 6 Community Council
Gila River Indian Community
District 6 Service Center
PO Box 54
Laveen, AZ 85339

RE: ADOT South Mountain Freeway Environmental Impact Statement and Location/Design Concept Report

Dear Mr. Evans:

Thank you for the opportunity to visit your District on November 13, 2004, to share information about the South Mountain Freeway Project and to receive District members' input, opinions and/or concerns regarding the study efforts. Please see the following list of the input we received.

- Concerns regarding truck traffic on 51st Avenue and potential truck bypass.
- What happened with the toll roads study?
- Over 85% of land is allottee land in the area under consideration.
- Trucks affecting Community: Kids feeling threatened.
- Advantages to access to freeway for those going to Sacaton for work or business. Allows an opportunity for Community transit.
- Turning 51st Avenue and Riggs Road back to the Community if a freeway is constructed.
- Concern regarding access to the dialysis center.
- Community members must have vehicles tested for emissions even though the low population and clean air of the Community should make this unnecessary.
- I-10 Widening issues:
 - Only two ways out of Sacaton – issue if there is a problem and people need to leave.
 - Frontage roads on I-10 – who will pay for construction? Maintenance?
 - Coordinated public outreach is necessary – have not heard from I-10 Widening team in a while.
 - Community emergency response teams (fire, EMT, police) are first contacted for incidents on I-10. Is there a potential to share this cost with neighboring communities?
- Do not consider putting the freeway on Riggs Road.
- If freeway is on allotted lands, it should be 1-1 ½ miles south of Pecos Road.
- How does the potential relocation of Rawhide play into the discussion of the freeway?

We recognize and respect the importance of the Gila River Indian Community ("GRIC") land to the landowners and members of the Tribal Community and we will not study alternatives on the Gila River Indian Community without approval from the Community.



2001 Award Recipient

We respect the Community's resolution regarding any freeway construction on GRIC lands. We also recognize that potential alternatives on GRIC lands would involve both allotted lands and tribal lands. As such, we are working with both the Natural Resources Standing Committee and the BIA to involve as many tribal members in the decision as possible.

If the Community allows the Study Team to study GRIC alternatives, these alternatives would be located within the study area described by the Community, which does not include Riggs Road. Also, any study of GRIC alternatives would include a detailed study of a wide variety of environmental, societal and design issues, including concerns regarding traffic, air quality, etc. If the Community does not allow the Study Team to study GRIC alternatives, the Study Team will continue to work with the Community to provide information regarding any possible alignment alternatives that are not on the Community, and the impacts that these alignments adjacent to the Community may create. Additionally, the Study Team will also continue to study and analyze the No-Build alternative that could become the preferred option if detailed study of the environmental, societal and design issues of each build alternative evidences too much negative affect.

Given the lengthy history of this project, (almost 20 years), there have been other alternatives studied in the area, including a toll road. During the development of the toll road study, during the early 1990's, it became apparent that the project would not be economically feasible and was dropped from further study. At this time, the South Mountain Freeway Study is not considering a toll road option.

We also recognize that there are other concerns within the Community regarding highways and freeways not associated with the South Mountain Freeway. As such, we will be researching the concerns you expressed regarding I-10. Where problems exist, ADOT will work with the Community on potential solutions.

During the last few months, we had the opportunity to visit Districts 4 and 7 with this same presentation. Attached is a summary of Community input from those meetings for your information. All this information will be provided to the Gila River Indian Community Department of Transportation, Natural Resources Standing Committee, and Executive Office, as well as the Bureau of Indian Affairs.

We at ADOT recognize the need for on-going discussion with the Community regarding this project and others. As such, we are offering to meet regularly with your District members to discuss issues pertaining to all ADOT facilities. We look forward to working with you. If you have any questions or comments regarding the information presented in this letter, please do not hesitate to contact Shannon at 602-712-7356 and Mike at 602-712-6836. Thank you again for the opportunity to meet with you and your District Council.

Sincerely,



Shannon L. Wilhelmsen, Director
Communication and Community Partnerships

CC: Ms. Sandra Shade, GRIC DOT
Mr. Gary Bohnee, GRIC Chief of Staff
GRIC Natural Resources Standing Committee
Mr. Ben Nuvamsa, BIA Superintendent
Ms. Cecilia Martinez, BIA Deputy Superintendent
Mr. Bill Vachon, FHWA
Mr. Dan Lance, ADOT
Ms. Amy Edwards, HDR

Sincerely,



Mike Bruder, Project Manager
ADOT Valley Project Management



Janet Napolitano
Governor

Victor M. Mendez
Director

Arizona Department of Transportation

Communication and Community Partnerships

206 South Seventeenth Avenue Phoenix, Arizona 85007-3213

Shannon Wilhelmsen
Communications
Director

April 15, 2005

Mr. Keith Fohrenkam, District Chairperson
District 7 Community Council
Gila River Indian Community
District 7 Service Center
RR 4 Box 186
Laveen, AZ 85339

RE: ADOT South Mountain Freeway Environmental Impact Statement and Location/Design Concept Report

Dear Mr. Fohrenkam:

Thank you for the opportunity to visit your District on November 13, 2004, to share information about the South Mountain Freeway Study and to receive District members' input, opinions and/or concerns regarding the study efforts. Please see the following list of the input we received.

- District 7 is opposed to the study.
- ADOT should ask the people "do you want a freeway or not" – simple question to determine if the District supports it.
- GRIC resolution reflects the direction of **all** districts, not just District 6.
- Development is occurring all around the Community. This is the only land the Community has.
- Consider putting the question of a South Mountain Freeway on Community land to a GRIC vote.
- Is No Build really an option?
- What is the study schedule?
- How much traffic is on 51st Avenue? Baseline Road? There has been an obvious increase in traffic along Baseline Road in the last 5 years.
- Could the Community take certain roads back from the County?
- Original alternative in 1985 did not parallel so much of the Community.
- Businesses in Laveen – do they still want the original alternative?
- Compensate landowners for land but then they have no land.
- Could compensation be – yearly to landowners? Through toll road?
- Community also includes landowners. Will ADOT coordinate with the landowners?
- Freeway would also serve the Community. It would take traffic off roads. Could return roads to the Community from the County.
- Other issues to be considered – Tres Rios, I-10 Widening, crime rates, tourism, and the future for the kids. All issues are interconnected and need to be addressed as such.
- District 7 motion still stands opposing the freeway.

We recognize and respect the importance of the Gila River Indian Community ("GRIC") land to the landowners and members of the Tribal Community and we will not study alternatives on the Gila River Indian Community without approval from the Community.



2001 Award Recipient

We respect the Community's resolution regarding any freeway construction on GRIC lands. We also recognize that potential alternatives on GRIC lands would involve both allotted lands and tribal lands. As such, we are working with both the Natural Resources Standing Committee and the BIA to involve as many tribal members in the decision as possible.

If the Community allows the Study Team to study GRIC alternatives, these alternatives would be located within the study area described by the Community, which does not include Riggs Road. Also, any study of GRIC alternatives would include a detailed study of a wide variety of environmental, societal and design issues, including concerns regarding traffic, air quality, etc. If the Community does not allow the Study Team to study GRIC alternatives, the Study Team will continue to work with the Community to provide information regarding any possible alignment alternatives that are not on the Community, and the impacts that these alignments adjacent to the Community may create. Additionally, the Study Team will also continue to study and analyze the No-Build alternative that could become the preferred option if detailed study of the environmental, societal and design issues of each build alternative evidences too much negative affect.

Given the lengthy history of this project, almost 20 years, there have been other alternatives studied in the area, including a toll road. During the development of the toll road study during the early 1990's, it became apparent the project would not be economically feasible and was dropped from further study. At this time, there is no consideration of a toll road for the South Mountain Freeway.

We also recognize there are other concerns within the Community regarding highways and freeways not associated with the South Mountain Freeway. As such, we will be researching concerns expressed regarding I-10. Where problems exist, ADOT will work with the Community on potential solutions.

During the last few months, we had the opportunity to visit Districts 4 and 6 with this same presentation. Attached is a summary of Community input from those meetings for your information. All this information will be provided to the Gila River Indian Community Department of Transportation, Natural Resources Standing Committee, and Executive Office, as well as the Bureau of Indian Affairs.

We at ADOT recognize the need for on-going discussion with the Community regarding this project and others. As such, we are offering to meet regularly with your District members to discuss issues pertaining to all ADOT facilities. We look forward to working with you. If you have any questions or comments regarding the information presented in this letter, please do not hesitate to contact Shannon at 602-712-7356 and Mike at 602-712-6836. Thank you again for the opportunity to meet with you and your District Council.

Sincerely,



Shannon L. Wilhelmsen, Director
Communication and Community Partnerships

CC: Ms. Sandra Shade, GRIC DOT
Mr. Gary Bohnet, GRIC Chief of Staff
GRIC Natural Resources Standing Committee
Mr. Ben Nuvamsa, BIA Superintendent
Ms. Cecilia Martinez, BIA Deputy Superintendent
Mr. Bill Vachon, FHWA
Mr. Dan Lance, ADOT
Ms. Amy Edwards, HDR

Sincerely,



Mike Bruder, Project Manager
ADOT Valley Project Management



Janet Napolitano
Governor

Victor M. Mendez
Director

Arizona Department of Transportation

Intermodal Transportation Division

206 South Seventeenth Avenue Phoenix, Arizona 85007-3213

David P. Jankofsky
Deputy Director

July 13, 2005

Mr. David Folts
Concerned Families Along South Mountain – Loop 202
3407 East Cederwood Lane
Phoenix, Arizona 85048

Re: South Mountain Freeway – Loop 202

Dear Mr. Folts:

Thank you for your letter dated, April 16, 2005, requesting that responses to 12 air quality questions, from the Concerned Families Along South Mountain Loop 202, be included in the Environmental Impact Statement (EIS) for the referenced project. Air Quality impacts are a very important component of the EIS; ADOT and FHWA will evaluate potential impacts in accordance with regulatory requirements. The Air Quality evaluation in the draft EIS will include a discussion of carbon monoxide, particulates, diesel fuel emissions, and various mobile source chemical emissions. We believe that the air quality evaluation in the draft EIS will address the issues raised by the Concerned Families in your letter. The Concerned Families will have an opportunity to ask for further clarification of air quality issues during the public comment period following issuance of the draft EIS. Responses will be included in the Response to Public Comments Section of the Final EIS.

It is important to note that mobile source control programs recently promulgated by the Environmental Protection Agency (EPA), such as, the reformulated gasoline program, national low emissions vehicle standards, Tier 2 motor vehicle emissions standards, gasoline sulfur control requirements, proposed heavy duty engine and vehicle standards, and on-highway diesel fuel sulfur control requirements are expected to dramatically reduce motor vehicle air pollutants. The EPA projects that between 1990 and 2020 these programs will reduce on-highway diesel particulate emissions by 90 percent and emissions of benzene, formaldehyde, 1,3-butadiene, and acetaldehyde by 67 to 76 percent.

ADOT appreciates Concerned Families' participation in the South Mountain – Loop 202 Environmental Impact Study. We will continue to seek input in public meetings that will be held throughout the study process. If you have questions or comments, please call me at 602-712-6161.

Sincerely,



Ralph Ellis
Environmental Planner
Environmental & Enhancement Group



2001 Award Recipient

Mr. David Folts
July 13, 2005
Page 2

c: Enrique Manzanilla, EPA
Lisa Hanf, EPA
Ken Davis, FHWA
Bill Vachon, FHWA
Steve Thomas, FHWA
Dan Lance, ADOT
Mike Bruder, ADOT
Shannon Wilhelmsen, ADOT
Amy Edwards, HDR
Project File

AS-5706



Janet Napolitano
Governor

Victor M. Mendez
Director

Arizona Department of Transportation

Communication and Community Partnerships

206 South Seventeenth Avenue Phoenix, Arizona 85007-3213

July 22, 2005

Shannon Wilhelmsen
Communications
Director

The Honorable Richard Narcia
Governor, Gila River Indian Community
PO Box 97
Sacaton, AZ 85247

Dear Governor Narcia:

Thank you for allowing myself, Bill Hayden, Dan Lance and Ken Davis from the Arizona Department of Transportation (ADOT) and the Federal Highway Administration (FHWA) to recently speak with the Community Council regarding transportation issues affecting the Community. It was an honor to discuss these issues with the Council and on behalf of ADOT and FHWA, we truly appreciated the opportunity to hear the Council's perspective on the many impacts our activities have on the quality of life of the Community members and the Community as a whole.

Please accept this letter as our commitment to continue to listen to Community concerns and issues and to work with you, the Community Council and the Community's Department of Transportation to address and work towards resolution of these issues. In an attempt to better address the concerns and issues we heard from the Community Council, we have attached a synopsis of the different points and our responses regarding explanation, resolution and follow-up on each item.

Once again, thank you very much for allowing us to speak with the Community Council and to hear the Council's perspective on the many activities ADOT is working on throughout the Community. We look forward to continuing our dialogue with the Council and working together on the issues addressed within the attachments to this letter and any additional issues that arise.

Very truly yours,

Shannon L. Wilhelmsen, Director
Communication and Community Partnerships

CC: Lt. Governor Thomas, Gila River Indian Community
Gila River Indian Community Council Members
Gary Bohnee, Gila River Indian Community Chief of Staff
Sandra Shade, Gila River Indian Community Department of Transportation
Cecilia Martinez, Bureau of Indian Affairs, Pima Agency
Victor Mendez, Arizona Department of Transportation
Bob Hollis, Federal Highway Administration



**Summary of Discussion Items
Gila River Indian Community Council July 5, 2005 Meeting
ADOT / FHWA Transportation Presentation**

ADOT Roadways Located Within the Gila River Indian Community

It is clear that an increase in communication, coordination and collaboration is necessary between ADOT and the Community regarding the many roadways that are within and traverse through the Community. To address these specific issues regarding possible signalization, turn lanes, facility access, litter pick-up and other maintenance issues, we will establish quarterly coordination sessions between ADOT (Director's Office, Phoenix District personnel, Tucson District personnel), the Community's Department of Transportation and FHWA to discuss the needs on each of these roadways and provide ongoing assessment of the conditions and necessary improvements. At this time, we are in the process of scheduling our first coordination meeting.

Specifically, to the issue of Community access to Loop 202 (Santan) at the McClintock interchange, please see the attached letter from Dan Lance addressing some of these issues.

In addition, ADOT will work with DPS (DPS stated they would send a letter to the Community, under separate cover expressing the Department's commitment to participate in this effort) to conduct ongoing coordination meetings with ADOT, DPS and the relevant departments within the Community to address the traffic routing and enforcement issues stated at the Community Council meeting. Also, ADOT will work with the Community's Department of Transportation and other relevant departments to redraft the ADOT Statewide Alternate Route Plan for the detour routes that involve roadways within the Community.

Regarding ADOT's current Pinal County Corridor Definition Study that is studying the necessity and impact of potential transportation corridors that impact the Community (i.e., "Hunt Highway"), we would like to make a presentation to the Natural Resources Standing Committee regarding the latest findings from the study. We will send a letter under separate cover to request this opportunity.

**ADOT / FHWA I-10 Widening (Loop 202 to Jct. I-8) Design Concept Report and
Environmental Assessment Study**

Frontage Roads

As discussed at the Community Council meeting, the issue of I-10 frontage roads deserves a lot of attention and coordination between ADOT and the Community. Please see the following synopsis of the I-10 Study Team's (ADOT / FHWA) perspective on this very important issue:

ADOT understands that the current Right of Way agreement permits the construction of Frontage Roads within the existing Right of Way of Interstate 10 as stated below:

"At such time as necessity for development of the adjacent land warrants such construction, the State Highway Department agrees to permit the construction of frontage roads within the right of way limits of Interstate Highway I-10 except where the State Highway Department establishes that such frontage road location interferes with the design, construction and maintenance of said Interstate #10 Highway. Said frontage roads shall be constructed to Arizona State highway Department standards for similar roads and upon their satisfactory completion the State shall accept the roads for permanent maintenance."

However, since this agreement was put in place in 1966 there have been many changes in the manner in which highways, and in particular high volume, high-speed highways and freeways, are designed and constructed. Most of these changes have been made to facilitate improved safety and more efficient traffic operation. The Frontage Road plan envisioned in the 1960's is no longer considered a safe or efficient roadway design, and both the Arizona Department of Transportation and the Federal Highway Administration would have serious reservations about approving or constructing such a plan.

To modify the original Frontage Road design to more accurately reflect current design standards, the I-10 Widening Study Team has worked for the past two years with the Technical Advisory Committee (TAC) to suggest an access plan for the Gila River Indian Community that may meet the Community's objectives. The suggested access plan includes Parallel Roadways in the north portion of the Community (north of Riggs Road) that are offset from Interstate 10 by approximately 500 feet. This design would enhance the safety of those using the parallel roadways, would greatly improve traffic operations, particularly around the interchanges and would expand the potential for economic development since landowners on both sides of the parallel roadways would have access.

The I-10 Widening Study Team requests permission to move forward with a Community Outreach Program that will present the Suggested Access Plan to Community Members, including the landowners along the freeway. The Community Council Resolution currently under consideration by the Community Council would offer the team direction from Council about the content of the plan before our team presents it to the Community at large.

Community Cultural Resources Management Program (CRMP)

ADOT clearly heard that the Community Council has concerns regarding the involvement of the Community's cultural resources staff in ADOT's highway studies (I-10 and South Mountain). In particular, the following concerns were expressed: 1) the possibility of a potential conflict of interest if Gila River Indian Community Cultural Resources Management staff participate as members of the study team; 2) the likelihood that such participation may lead to the inadvertent disclosure of sensitive Community information; and 3) the possibility that such participation may divert important CRMP resources from Community projects such as the completion of the Pima-Maricopa Irrigation Project (PMIP). Please see the following synopsis of the I-10 Study Team and the South Mountain Study Teams' perspectives regarding this issue:

To complete a highway study, ADOT must follow a process defined by Federal Law known as the National Environmental Policy Act (NEPA), and this law requires ADOT

to complete cultural resource surveys. In order for ADOT to complete these surveys, cultural resource experts would obtain permission from the community to perform field surveys of the lands potentially affected by the plans suggested during the study. However, CRMP staff has already completed over 80% of these needed surveys.

ADOT understands the sensitivity the Community has for preserving its cultural heritage, and would like to avoid a situation where outside experts would be needed to survey community lands. It is our belief that there is a benefit to the Community to have CRMP staff involved in the study, and to remain the guardian of this sacred Community information. CRMP would only disclose information that is pertinent to complying with Federal Regulations, and ADOT commits to not disclose specific relic information to the general public, and only release information necessary for completing the NEPA process.

The type of surveys needed to comply with the Federal Regulations is not invasive, meaning no recovery of artifacts is required, and so the number of staff members needed to complete the surveys is limited. This is in contrast to PMIP where data recovery is needed, requiring trenching and laborious recovery of artifacts.

Community Cultural Resource Preservation

ADOT understands the Community's concerns regarding the impact ADOT activities have had on the preservation of the Community's cultural resources and sacred sites. Please see the following commitment expressed regarding this issue from the I-10 Study Team:

ADOT understands there is a concern over the impact to cultural resource sites from the original construction of I-10, the widening of I-10, and the re-routing of traffic from I-10 during freeway closures. Therefore, one of the key reasons for including CRMP is this concern for protection of sacred resource sites.

In order to lessen and avoid impacts to important cultural sites, ADOT will rely on the recommendations of CRMP on how best to facilitate these activities throughout the implementation of a mutually agreed upon access plan.

I-10 Alternative Routes

ADOT understands there is disruption to the Community when unfortunate incidents occur on Interstate 10 that require closure of this main thoroughfare as it runs through the Community. In addition to addressing these issues through the coordination sessions between ADOT, DPS and the relevant departments throughout the Community, and the redrafting of the ADOT Statewide Alternate Route Plan as it relates to roadways within the Community, please see the following perspective on this issue from the I-10 Study Team:

The Suggested Access Plan proposed by the I-10 Widening Study Team includes potential roadways that could be used as a parallel detour route for I-10. ADOT may also propose innovative ideas to provide signing that could be activated during an incident to better guide drivers that are unfamiliar with the Community through the approved detour routes.

The I-10 Widening Study Team requests permission to move forward with a Community Outreach Program that will present the Suggested Access Plan to Community Members, including the potential detour routes. The Community Council Resolution, currently under consideration by the Community Council, would offer the team direction from Council about the content of the plan before our team presents it to the Community at large.

ADOT / FHWA South Mountain Freeway Environmental Impact Statement Study

ADOT and FHWA clearly heard many of the concerns expressed by the Community Council regarding the South Mountain Freeway Study and the potential impacts of the current study on the Community. ADOT recognizes the importance of continuing to work with the Community members, the Community Council and the Community's Department of Transportation to openly communicate and address these potential impacts throughout every step of the study process. Please see the following South Mountain Study Team's perspective on the various issues stated by the Community Council during our recent presentation:

Preservation of Land and Quality of Life

As part of the study process, ADOT is required by federal law to analyze the potential affects of both building a freeway and not building a freeway on two very important environmental resources – Air and Noise.

As a first directive, the study team looks to eliminate all impacts. However, it is not possible to eliminate all impacts, so the next step is to minimize the impacts. Ultimately, if there are impacts to these environmental resources as a result of the project, ADOT will work with the Community on acceptable mitigation solutions. Some approaches used on past projects include:

- Construct noise barriers and apply rubberized asphalt to minimize the affect of noise.
- Develop an economic opportunities study independent of the environmental study that looks at potential development opportunities.
- Lead the process of acquiring lands currently not part of the Community to exchange for Community lands used if a Community alternative is selected for build.
- Provide signage along the freeway identifying the adjacent lands as being the Gila River Indian Community.

Community Freeway Access

ADOT will work with the Community to incorporate the Community preferences regarding access to freeway interchange locations and which freeway access points best accommodate the Community's plans for the future. As a regional facility, the Community would be allowed access to the freeway at any of the proposed interchange locations. Specifically, access would be immediate in areas where the Community has existing roadways and in areas where Community roads do not currently exist, access

would be available whenever the Community develops the roadways that connect to the interchange locations.

In an effort to fully understand the Community's interchange preferences, ADOT will issue a letter to the Community detailing potential interchange locations along the alternatives currently under study. Additionally, we will provide details of potential options for the 51st Avenue interchange. We would like your input on all the potential interchange locations and any comments you may have specific to the 51st Avenue options.



Janet Napolitano
Governor
Victor M. Mendez
Director

Arizona Department of Transportation

Intermodal Transportation Division

206 South Seventeenth Avenue Phoenix, Arizona 85007-3213

July 25, 2005

David P. Jankofsky
Deputy Director

The Honorable Richard Narcia
Governor, Gila River Indian Community
PO Box 97
Sacaton, AZ 85247

Dear Governor Narcia:

Thank you for allowing ADOT and FHWA representatives to discuss important transportation related issues with the Community Council on July 5, 2005. Please accept this letter as my response to important issues identified by the Council regarding the Santan Freeway.

There continues to be a misunderstanding of access to/from the Santan Freeway at McClintock Drive and Chandler Village Drive (Country Club Way). The attached Final Environmental Update, Santan Freeway (SR 202L), 56th Street to Price Freeway, dated April 1999, clearly illustrates that access to/from GRIC roadways at these locations was planned. Whenever the Community desires to connect roadways to the Santan Freeway at McClintock Drive and Chandler Village Drive, a no cost permit will be issued after ADOT and GRIC agree upon the engineering details of these roadway connections. ADOT would like to work with the Community to assure adequate control of access of approximately 300 feet is protected prior to the first driveway or side street connection to these crossroads. ADOT will purchase this control of access and participate in the construction costs within these limits when these connections are made.

Similarly, the Community would also have access to the South Mountain Freeway traffic interchanges intersecting local roads. If a freeway were constructed along Pecos Road, the Community would have access to the interchanges that were constructed. Or if a freeway were constructed on Community land then the Community would have access on both sides of the freeway. Either of these concepts assumes that a build alternative is selected. ADOT has the final say on freeway interchange locations that connect to locally owned roads. This is done in cooperation with affected local governments but it is ultimately an ADOT decision. ADOT is not in the leadership role for determining where roadways may cross over or under the freeway, but do not connect to the freeway. Those roadways across freeways need to be resolved between appropriate political jurisdictions, in cooperation with ADOT, to assure freeway operations and safety is maintained.

